

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:	PROMESA Title III
The Financial Oversight and Management Board for Puerto Rico,	No. 17 BK 3283 (LTS)
As representative of	(Jointly Administered)
The Commonwealth of Puerto Rico, et. al.	
Debtors ¹	

MOTION FOR EXTENSION OF TIME TO RESPOND TO THREE HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FILED BY AEELA

TO THE HONORABLE COURT:

Asociación de Empleados del ELA (“AEELA”), through the undersigned counsel, moves the Court for an extension of time until October 20, 2021, at 4:00 p.m. to reply to the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Commonwealth of Puerto Rico (“ERS” and together with the Commonwealth, the “Debtors”) *Three Hundred Eighty-Eighth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico And The Employees Retirement System Of The Government Of The Commonwealth Of Puerto Rico To Claims Filed By AEELA* (the “Objection”)

¹ The Debtors in the Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

and in support thereof states as follows:

1. While the Objection is dated August 20, 2021, it was not received at the undersigned counsel's office until today, September 14, 2021.
2. In the Objection, Debtors are objecting to seventeen proofs of claims filed by AEELA which, excluding possible duplications, exceed \$52,000,000.00.
3. In accordance to the notice of the Objection, Debtor has until September 20, 2021 at 4:00 p.m. (AST) to respond thereto, which is impossible for AEELA to do considering the nature of the claims and the Objection, and the need for the undersigned counsel, who will be in Lexington, Kentucky from September 18-26, 2021, to meet with AEELA's management in order to discuss the Objection and AEELA's reply thereto.

WHEREFORE, it is respectfully requested that AEELA be granted until October 20, 2021 at 4:00 p.m. (AST) to reply to the Objection, as set forth in the proposed order attached hereto.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I electronically filed the foregoing motion with the Clerk of the Court using the EM/ECF system, which will send a notification to all attorneys of record.

San Juan, Puerto Rico, this 14th day of September 2021

s/CHARLES A. CUPRILL-HERNÁNDEZ

USDC-PR 114312

Charles A. Cuprill, P.S.C. Law Offices

Counsel for AEELA

356 Fortaleza Street, Second Floor

San Juan, PR 00901

Tel.787-977-0515

Fax: 787-977-0518

E-mail: ccuprill@cuprill.com